

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

BEATRICE KELLY, and
RALPH KELLY,

Plaintiffs,

v
Whalen

Case No. 2:18-cv-10982
Hon. Gershwin A. Drain
Magistrate Judge R. Steven

METROPOLITAN GROUP PROPERTY
AND CASUALTY INSURANCE COMPANY

Defendant.

JOSEPH L. MILANOWSKI (P47335)
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MILANOWSKI, P.C.
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**DEFENDANT METROPOLITAN PROPERTY AND CASUALTY
INSURANCE COMPANY'S WITNESS LIST – EXPERT AND LAY AND
EXHIBIT LIST**

NOW COMES Defendant METROPOLITAN GROUP PROPERTY AND
CASUALTY INSURANCE COMPANY, by and through its attorneys Kerry Lynn
Rhoads and Segal McCambridge Singer & Mahoney and with regard to
Defendant's Witness List–Expert and Lay and Exhibit List provides the following:

1. Beatrice Kelly (Can be contacted through Plaintiff's counsel)
2. Ralph Kelly, 7560 Angle Falls, Maineville, OH 45039.
3. Melaundra Floyd (address unknown)
4. Cassandra Floyd (address unknown)
5. Larry Foulkart, Fire Marshall, 23200 Gratiot, Eastpointe, MI 48021
6. Donald Tabron, Public Adjuster, 17301 Livernois, Suite 233, Detroit, MI 48221.
7. Representatives, agents, employees and/or the custodian or records of the City of Eastpointe Fire Department, 23200 Gratiot, Eastpointe, MI 48021.
8. Representatives, agents, employees and/or the custodian or records of the City of Eastpointe Building Department, 23200 Gratiot, Eastpointe, MI 48021.
9. Representatives, agents, employees and/or the custodian or records of the City of Eastpointe Water Department, 23200 Gratiot, Eastpointe, MI 48021.
10. Representatives, agents, employees and/or the custodian or records of the City of Eastpointe Police Department, 23200 Gratiot, Eastpointe, MI 48021.
11. Representatives, agents, employees and/or the custodian or records of Metropolitan Property and Casualty Insurance Company including but not limited to, Judy Bird, Dennis Bagozzi, Dan Reist, Kimberly Burns, Amy (last name unknown), John (last name unknown) and Jim Nickle. (Can be contacted through Defense counsel)

12. Chris Holt, Landlord/Owner of 7560 Angel Falls, Maineville, OH 45039.

13. Any and all employees, agents, inspectors, representatives and/or records custodians of:

- a. Internal Revenue Service
- b. State of Michigan
- c. Michigan Department of Community Health
- d. Michigan Department of Health & Human Services
- e. Social Security Administration
- f. Michigan Department of Worker's Compensation
- g. DTE Energy
- h. City of Eastpointe
- i. Red Cross
- j. Wayne County Treasurer
- k. Wayne County Circuit Court
- l. Wayne County Register of Deeds
- m. Detroit Water & Sewer
- n. Fifth Third Bank
- o. Ocwen Loan Service
- p. Key Bank

14. Representatives, agents, employees and/or the custodian or records of Herndon & Associates, including but not limited to, Jeffrey Terski. (Expert) (Fire Investigation)

15. Representatives of Reed Detective Agency (Potential Expert)

16. Representatives of ACS Inc. (Potential Expert)

17. Representatives of the Robinson Group (Potential Expert)

18. Representatives of Allied Investigative Services (Potential Expert)

19. Representatives of Engineering Systems, Inc., (Potential Expert)
(Accident Reconstruction)

20. Don Parker, (Potential Expert) (Engineering)

21. Gary Nayh, CPA, Walworth & Nayh (Potential Expert)
(Economics/Accountant)

22. Mick Kahaian, Stout Risius Ross (Potential Expert)
(Economics/Accountant)

23. Any and all witnesses, expert and lay, identified and named on any
other parties Witness List.

24. Any and all witnesses necessary to authenticate any document used in
relation to this litigation.

25. Any and all individuals mentioned in depositions, pleadings, court
documents and the like.

26. Any and all witnesses, expert and lay, whose identities become known
throughout the course of discovery in this matter.

27. Any and all rebuttal witnesses, expert and lay.

28. Any and all res gestae witnesses.

29. Defendant reserves the right to name a liability witness, if necessary.

30. Defendant reserves the right to amend and/or supplement this witness
list.

EXHIBIT LIST

1. Any and all records regarding Plaintiff's and/or the incident at issue in the possession of the individuals and entities listed in Defendant's witness list.
2. Any and all reports, graphs, charts and/or other documents produced by defense experts.
3. Any and all pleadings, deposition transcripts, discovery requests, discovery responses and/or other documents produced and/or exchanged during the course of discovery and this litigation.
4. Any and all photographs.
5. Plaintiff's local, state and federal tax returns, schedules and W-2 forms.
6. Any and all records of the following entities:
 - a. Internal Revenue Service
 - b. State of Michigan
 - c. Michigan Department of Community Health
 - d. Michigan Department of Health & Human Services
 - e. Social Security Administration
 - f. Michigan Department of Worker's Compensation
 - g. Metropolitan Property and Casualty Insurance Company
 - h. Donald Tabron, Public Adjuster
 - i. DTE Energy
 - j. City of Eastpointe
 - k. Red Cross
 - l. Wayne County Treasurer
 - m. Wayne County Circuit Court
 - n. Wayne County Register of Deeds
 - o. Detroit Water & Sewer

- p. Fifth Third Bank
- q. City of Eastpointe Building Department
- r. City of Eastpointe Water Department
- s. City of Eastpointe Fire Department.
- t. Larry Foulkart, City of Eastpointe Fire Marshall
- u. Chris Holt, Landlord/Owner
- v. Ocwen Loan Service
- w. Key Bank

8. The defendant reserves the right to amend and/or supplement this exhibit list.

SEGAL McCAMBRIDGE SINGER & MAHONEY

By /s/ Kerry Lynn Rhoads
KERRY LYNN RHOADS (P55679)
Attorney for Defendant
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(248) 994-0060

Dated: June 29, 2018

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PROOF OF SERVICE

The undersigned certifies that Defendant's Witness List – Expert and Lay and Exhibit List were served upon all parties to the above cause by service through CM/ECF Electronic Court Filing on June 29, 2018.

/s/ Tanya Pope